Monsanto

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(red)

POLYMER PRODUCTS COMPANY
Nitro, West Virginia 25143
Phone: (304) 755-3341

January 16, 1985

CERTIFIED

Mr. Dave L. Chaney
Industrial Waste Section - Permits Branch
West Virginia Department of Natural Resources
350 North Vance Drive
Beckley, WV 25801

Dear Mr. Chaney:

RE: WATER POLLUTION CONTROL PERMIT #IW-6012-78
ARMOUR CREEK LANDFILL

Our Water Pollution Control Permit #IW-6012-78 for operation of the Monsanto Plant Landfill has been extended until February 4, 1985. This extension was to allow time for the State to receive and review information from the Environmental Protection Agency concerning the dioxin study done in September of 1984 at our facility.

It is my understanding that all information requested for the renewal of our permit has been submitted and is acceptable to you. The only remaining question concerns the presence of dioxin at the site. As you know, in 1980, the plant did an extensive upgrading of our facility. This included eliminating all standing water from the site, installing a perimeter security fence, closing the inactive portion of the landfill and capping this area with two feet of impervious clay, grading and seeding the site, and developing a new secure non-hazardous cell for disposal of our plant trash. I have attached a detailed diagram of the site showing the location of our present cell, the capped inactive areas and the location of the samples that the EPA took when they tested for dioxin.

You indicated that you have not received a report from the EPA with the results of the samples they took in September. We have not received a report either, although we have been given the results over the phone. These results are found in Table I (attached). They were confirmed by our Dayton Labs.

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We are presently in negotiations with the EPA to do further testing at the site. The program will consist of three phases. The first phase will be to write a Work Plan outlining the procedure we are going to follow to perform the second phase. The second phase will be the actual Remedial Investigation. Its purpose will be to do additional sampling to determine the extent of any dioxin contamination at the landfill. Our thinking is to take 17 additional samples. Thirteen will be taken in the inactive portion of the fill as this is where we would expect to find any dioxin since production of 2,4,5-T ceased in 1969 and we started using our present cell in 1981. However, in order to confirm that no dioxin is in our present cell, we plan on taking two samples in our present cell and one in each of our two sludge pits. We feel this should satisfy your concerns on the presence of dioxin in our current site. Phase III will be development of a Feasibility Study to determine the most appropriate remedial action to correct any concerns raised by the remedial investigation.

We expect to perform the Phase II sampling in early February if we receive all the necessary approvals of our work plan. Once the samples are taken, there will be at least two weeks required for analysis. This will take us beyond our present permit extension of February 4, 1985. This letter is to request another 90 day extension to give us the time necessary to write our Work Plan and Remedial Investigation and to acquire the required approvals for the work. Of course, this will in no way affect the operation of our landfill and we will continue, as always, to operate the site in compliance with our current permit.

We appreciate your help and patience in this matter. If you need any additional information, please call me.

Sincerely,

Keith S Miller

K. S. Miller
Envr. Specialist

sa

Attachments

bcc: Walter Lee - EPA
H. M. Galloway

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TABLE I

Results of Dioxin Testing

Monsanto-Nitro Landfill

Sample No.	EPA Result (ppb)
1. A	No Result (Monsanto Result - ND)
B	10.3*
C	2.8
2.	ND
3. A	ND
B	ND
C	ND
4. A	0.12
B	ND
C	ND
5. A	ND
B	ND
C	ND
6.	ND
7.	ND

ND = Non Detected
* - Sample failed QA/QC testing, but presence confirmed.

The samples were taken at the surface or, where identified by A, B, or C, they were taken at 0-12", 12"-24", and 24"-36" beneath the surface, respectively.

1/16/85